

AR201-13244

October 1, 2001

RECEIVED
31,827
2001 OCT - 5 PM 2:53



VIA FEDERAL EXPRESS

Christine Todd Whitman, Administrator
US EPA
PO Box 1473
Merrifield, VA 22116

ORIGINAL

Attn: Chemical Right-to-Know Program

Subject: Submittal of Information for the HPV Challenge Program

Dear Ms. Whitman:

3M is pleased to submit the Test Plan and Robust Summaries for the class of inert perfluorinated compounds (PFCs) covered by a single "generic" CAS# 86508-42-1, defined as "Perfluoro-compounds, C5-C18" to the HPV Challenge Program, AR-201. CAS #311-89-7 is specifically identified in the title of this voluntary HPV submission because the EPA lists it as a separate HPV chemical. 3M did report this product separately in its 1990 IUR submission. However, CAS #311-89-7, like a number of other products with individual CAS numbers, is encompassed within the "generic" CAS number. It is included in this test plan, rather than separately, because it meets the toxicologic and environmental profile of this class of compounds.

Because available data are sufficient to address relevant endpoints, no further testing is proposed. This information is provided in .pdf format on a CD and hardcopy. A copy of this Test Plan and Robust Summaries is also being forwarded to the American Chemistry Council HPV Tracker System.

If you have any questions relative to this submittal please contact Teresa Borzcik (trborzcik@mmm.com) at 651/736-2032.

Sincerely,

Michael A. Santoro, Director
Environmental, Health, Safety & Regulatory Affairs
Specialty Material Markets Group
3M Center Bldg. 236-1B-10
St. Paul, MN 55144
651/733-6374

Enc.

Copy: Larry Rampy, ACC